

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DANIEL ANDERSEN,	)	
	)	
Plaintiff,	)	16 CV 1963
	)	
v.	)	JUDGE KENDALL
	)	
CITY OF CHICAGO, et al.	)	
	)	
Defendants.	)	JURY TRIAL DEMANDED

**PARTIES' JOINT MOTION  
TO EXTEND EXPERT DISCOVERY**

The Parties, by and through their undersigned attorneys, jointly move this Court for an extension of time to complete expert discovery. In support of their Motion, the Parties state as follows:

1. On April 6, 2018, Honorable Judge Kendall ordered Expert Discovery to close by January 31, 2019.

2. Counsel are working diligently to meet this deadline. However, due to counsel's upcoming trial schedules in the fall, the number of experts both sides anticipate disclosing, the experts' schedules, and the holidays, counsel for both the Defendants and Plaintiff request that this Court grant a short extension of eight weeks from January 31, 2019 to March 29, 2019.

3. Parties have stipulated and agreed to the following deadlines:

- a. Plaintiff will disclose experts on October 1, 2018. The Parties have agreed that one of Plaintiff's expert's reports will be disclosed on November 1, 2018.

Plaintiff further agrees that his October 1, 2018 disclosure will include the name

and subject matter of the additional expert whose report will be produced on November 1, 2018.

- b. Plaintiff will disclose the last expert report on November 1, 2018.
  - c. Defendants will depose all experts by December 3, 2018 and the expert whose report is disclosed on November 1, 2018 on or before January 11, 2019.
  - d. Defendants will disclose all their experts on January 11, 2019. Defendants agree that this disclosure will include the name and subject matter of the expert whose report will be produced on February 8, 2019.
  - e. Defendants will disclose a counter report for Plaintiff's November 1, 2018 disclosure by February 8, 2019. Defendants agree to make his expert available for deposition on a date between February 14, 2019 to February 22, 2019.
  - f. Plaintiff will depose all experts by February 22, 2019 and disclose any rebuttal expert reports by February 28, 2019. Depending on the number of Plaintiff's rebuttal experts, Defendants anticipate deposing those experts within five weeks after Plaintiff's disclosure by March 29, 2019. If no rebuttal reports are disclosed, expert discovery will close on February 22, 2019.
4. No other deadlines, including the deadline the Court has set for dispositive motions of April 1, 2019 or the trial date of September 9, 2019, will need to be extended as a result of this motion.
5. Additionally, no Party will be prejudiced by the short extension to complete expert discovery by either February 22, 2019 or March 29, 2019.

WHEREFORE, the Parties jointly request an Order from this Court granting an extension of the deadline to complete expert discovery from January 31, 2019 to either February 22, 2019 or March 29, 2019, depending on if Plaintiff discloses and rebuttal expert reports.

Dated: June 22, 2018

Respectfully submitted,

/s/ Heather Lewis Donnell

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**CERTIFICATE OF SERVICE**

I, Heather Lewis Donnell, an attorney, certify that on June 22, 2018 I filed a copy of the foregoing motion via the Court's electronic filing system and thereby served a copy on all counsel of record.

/s/ Heather Lewis Donnell